

**REMARKS**

Initially, Applicant thanks the Examiner for the courtesies extended during the telephonic interview of January 5, 2006.

Claims 1-18 are all the claims pending in the application. Claims 1, 8-10 and 17-18 are amended. No new matter is presented.

To summarize the Office Action, claims 1-4, 8-13, and 17-18 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Sawada (U.S. Patent No. 6,735,619) in view of Leong et al. (U.S. Patent No. 6,393,475, hereinafter "Leong"). Further, claims 5-7 and 14-16 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form to include all the limitations of the respective base claims and any intervening claims.

**Claim Rejections - 35 U.S.C. § 103(a)**

As noted above, claims 1-4, 8-13 and 17-18 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Sawada in view of Leong. Applicant respectfully traverses and submits that the combination of features defined by these claims would not have been *prima facie* obvious in view of Sawada and Long, as evidenced by the following.

**Independent claims 1 and 10**

With respect to claim 1, Applicant submits neither Sawada nor Leong, whether taken alone or in combination, teaches or suggests *at least* the features of the recited "the one of the terminal devices", which includes "a first determination section for determining whether the agent module which has transmitted the request signal is an agent module to which the one of the terminal devices receiving the request signal is to be connected" and "an establishment section

for establishing the information transmission enabled state between the one of the terminal devices receiving the request signal and the agent module which has transmitted the request signal, when the first determination section ascertains that the agent module which has transmitted the request signal is the agent module to which the one of the terminal devices receiving the request signal is to be connected.”

In this regard, Applicant notes that the Examiner alleges that computer terminal 20 of Sawada corresponds to the claimed “one of the terminal devices” and further alleges that gateway apparatus 12 corresponds to the claimed “agent module”. However, as demonstrated by the following, Sawada’s computer terminal 20 and gateway apparatus 12 fail to suggest all the features of the one of the terminal devices and agent module, as defined by claim 1.

For instance, Sawada teaches a system to operate a home network device from a remotely located terminal connected to a gateway apparatus via an Internet or wide area network (WAN) connection. *See* Sawada at col. 1, lines 30-35, col. 4, lines 1-4 and Fig. 1. As taught by Sawada, devices such as local computer terminal 20, lamp 34 and camera 24 are connected to gateway apparatus 12 in a users home via IEEE 1394 connections 36a, 36b, and 36c. *See* Sawada at col. 4, lines 5-35 and col. 5, lines 5-42. Further, gateway apparatus 12 includes a WWW server 16, which detects IEEE 1394 devices that are connected and stores the device information in a device information table 30. *See* Sawada at col. 4, lines 35-41.

With respect to remote activation of the 1394 devices, Sawada teaches that WWW server 16 receives an access request from a remote terminal (i.e., one of computer terminals 41 and 47) and prompts the remote user to enter an user ID and password in order to authorize access to the gateway. *See* Sawada at col. 10, lines 44-55. If the remote user is authorized, gateway apparatus

12 sends a home device list to the remote terminal, where the user can select a remote control operation of one of the devices, such as turning on lamp 34, from a menu displayed on the remote terminal's browser. *See* Sawada at col. 11, lines 3-52.

However, Sawada merely teaches that gateway apparatus 12 writes data to a specific IEEE 1394 address corresponding to the selected device in response to the remote user's selection from the displayed menu. *See* Sawada at col. 11, lines 6-11. In other words, the IEEE 1394 device merely recognizes a command transmitted on the IEEE 1394 bus which corresponds to its unique ID and executes the command, such as lamp 34 turning on.

There is no suggestion that local computer terminal 20 of Sawada functions any different than any other device which is connected to gateway apparatus 12 via the IEEE 1394 bus. Rather, Sawada teaches that computer terminal 20 simply recognizes instructions from gateway apparatus 12 addressed to it and responds accordingly. Indeed, of the portions of Sawada cited by the Examiner which allegedly teach the claimed "first determination section" of the "one of the terminal devices", which the Examiner analogizes to local terminal 20, only column 5, lines 1-50 mentions computer terminal 20 and even this reference merely describes the unique IEEE 1394 address assigned to the local terminal.

Thus, as evidenced by the foregoing, Sawada fails to disclose at least the claimed "first determination section" which *determines* whether the agent module which has transmitted the request signal is an agent module to which the terminal device receiving the request signal is to be connected, as claimed, because computer terminal 20 simply receives an instruction which is addressed to its IEEE 1394 unique ID. Moreover, Sawada necessarily fails to suggest the claimed "establishment section" because there is no suggestion that any transmission enabled

state is enabled ***based on the determination*** that the agent module which has transmitted the request signal is the agent module to which the terminal device receiving the request signal is to be connected, as claimed.

Further, Leong fails to compensate for the deficiencies of Sawada. For instance, the Examiner alleges that Leong teaches “connection to a plurality of terminal devices via an agent module.” However, Leong merely teaches a network management protocol in which method token associated with a network management function is incorporated directly into a Uniform Resource Locator (URL) which is propagated from a browser. *See* Leong at col. 3, lines 31-39. According to Leong, an agent receives a request message from a remote client requesting that the agent supply a “URL dictionary” to the client. The URL dictionary is simply a list of managed objects of the agent, which allows the remote client to request various network functions from the managed objects. *See* Leong at col. 13, lines 8-55. Thus, Leong does not teach the features of the first determination section and the establishment section, which are deficient in Sawada.

Further, claim 1 recites the feature of the agent module includes a request signal transmission section for transmitting to the one of the terminal devices a request signal requesting to ***initiate and establish*** an information transmission enabled state between the one of the terminal devices and the agent module. As noted above, the Examiner alleges that gateway 12 of Sawada is an agent module and computer terminal 20 is a terminal device. However, as discussed above, gateway apparatus 12 of Sawada merely writes data to a specific IEEE 1394 address corresponding to the selected device, such as terminal 20, in response to the remote user’s selection and computer terminal 20 simply recognizes instructions from gateway apparatus 12 addressed to it and responds accordingly.

Conversely, as described, for instance, in the exemplary embodiment depicted in Figure 3, the request signal transmission section of the agent server transmits a request signal that requests to initiate and establish the information transmission enabled state between the terminal device and the agent module. *See e.g.*, Specification at page 29, line 9 - page 30, line 6. Sawada does not teach that the gateway transmits a request signal that initiates an information transmission enabled state in the manner claimed, and Leong fails to compensate for this deficiency.

Therefore, even assuming for the sake of argument that the Examiner's asserted motivation to combine the teachings of Sawada and Leong is proper, the combination fails to teach or suggest all the features of claim 1. Accordingly, reconsideration and withdrawal of the rejection of claim 1 is requested.

For reasons analogous to those discussed above, Applicant submits that Sawada and Long fail to teach or suggest all the features of method claim 10 because neither Sawada nor Long teaches "determining whether the agent module is an agent module to which the one of the terminal devices is to be connected" and "establishing the information transmission enabled state between the one of the terminal devices and the agent module, when it is determined that the agent module is the agent to which the one of the terminal devices is to be connected", as claimed. Moreover, claim 10 recites the feature of the agent module transmitting to one of the terminal devices a request signal requesting to initiate and establish an information transmission enabled state between the one of the terminal devices and the agent module. The gateway apparatus of Sawada does not transmit a request signal, as defined by claim 10.

Reconsideration and withdrawal of the rejection of claim 10 is therefore requested.

Further, Applicant submits that claims 2-7 and 11-16 are allowable at least by virtue of their dependency from claims 1 and 10, respectively.

Independent claims 8 and 17

Claim 8 defines an agent module for relaying an access from a terminal device to a network, comprising, *inter alia*, “a request signal transmission section for transmitting to the terminal device a request signal requesting to initiate and establish an information transmission enabled state between the agent module and the terminal device, the request signal including identification information to identify the agent module.” Applicant submits that neither Sawada nor Leong teaches this feature.

As discussed above, Sawada merely teaches that the gateway apparatus 20 transmits a command to one of the IEEE 1394 devices, which then execute the command if the command is recognized as being addressed to a particular device. Thus, Sawada does not suggest a request signal transmission section that transmits a request signal requesting to initiate and establish an information transmission enabled state, as claimed. Further, as discussed above, Leong merely teaches transmission of a URL dictionary containing a list of managed objects from an agent to a remote terminal, and fails to compensate for the deficient teaching of Sawada.

Claim 17 defines an information recording medium in which an agent program is stored in a readable form for a computer method, and recites the feature of transmitting from an agent module to a terminal device a request signal requesting to initiate and establish an information transmission enabled state between the terminal device and the agent module, the request signal including identification information to identify the agent module. Thus, claim 17 is believed to

be allowable for analogous reasons. Further, neither Sawada nor Leong teaches an agent that relays an access from the terminal device to a network, as claimed.

Accordingly, reconsideration and withdrawal of the rejection of claims 8 and 17 is requested.

Independent claims 9 and 18

Claim 9 defines a terminal device comprising, *inter alia*, a determination section for determining whether the agent module which has transmitted the request signal is an agent module to which the terminal device receiving the request signal is to be connected; and an establishment section for establishing an information transmission enabled state between the terminal device receiving the request signal and the agent module which has transmitted the request signal, when the determination section ascertains that the agent module which has transmitted the request signal is the agent module to which the terminal device receiving the request signal is to be connected.

As discussed above with respect to claim 1, neither Sawada nor Long teaches or suggests the features of the determination section or the establishment section, as claimed. Further, claim 9 recites the feature of the request signal, which is issued by the agent module, *initiates* establishing the information transmission enabled state between the terminal device and the agent module. Applicant submits that Sawada further fails to suggest this feature, at least because, in Sawada, the terminal would necessarily issue a request to the gateway apparatus, which the Examiner alleges to operate as a WWW server that functions to prompt the user to enter authentication information, which occurs after the gateway is contacted by a URL

"request" from the terminal. Thus, Sawada fails to suggest all the features of claim 9, and Leong fails to compensate for this further deficiency.

For analogous reasons, Applicant submits that Sawada and Leong fail to teach all the features of the information recording medium defined by claim 18. Accordingly, reconsideration and withdrawal of the rejection of claims 9 and 18 is requested.

### **Conclusion**

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,



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